TSD File Inventory Index

Date: April 4, 2000

Initial: CM Generis

Facility Name: GMC (Assembly Division/Norwood Facility)			
Facility Identification Number: OHD 004 240 089			
A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status A-2	/	.1 Correspondence	
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	✓	**C.1 Compliance - (Inspection Reports)** See C.2	
.3 Part A Application and Amendments	✓	**C.2 Compliance/Enforcement** C.2	/
.4 Financial Insurance (Sudden, Non Sudden)	/	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence A.4.1 - A.4.6	/	.4 RFA Reports D.1.4	/
.2 Closure/Post Closure Plans, Certificates, etc See A.4.1		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 4

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		**D.5 Corrective Action/Enforcement**	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		**E. Boilers and Industrial Furnaces (BIF)**	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		**F.1 Imagery/Special Studies** (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		**G.1 Risk Assessment**	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: _____

OhioEPA

Re: Hamilton County
Hazardous Materials
GMAD-Norwood
OHD 004260089
HW 05-31-0441

Mr. Mark Endres
General Motors Assembly Division
1726 Smith Road
Norwood, Ohio 45212

April 13, 1983

GMC-ASSEMBLY DIVISION
NORWOOD PLANT

Dear Mr. Endres:

On 11 April 1983, I reinspected your facility at 1726 Smith Road to verify compliance with regulations cited in my letter of 28 February 1983. General Motors was represented by you.

All the violations are corrected. General Motors Assembly Division in Norwood is in compliance with Federal and State hazardous waste regulations.

If you have any questions, please call me at 513-461-4670.

Compliance with applicable parts of 40 CFR and OAC 3745 is required by Federal and State EPA authorities. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Sincerely,

Jeffrey Moler
Hazardous Materials Management

JM/dkp

cc: Ken Westlake, USEPA, Region V
cc: Paula Cotter, DHMM, SE&S, CO

Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402-2086 (513) 461-4670

APR 7 RECD

Manzardo WQP
Kerlicher AC
Tebo WD
Miner HW

General Motors Corporation

Central Office
30009 Van Dyke Avenue
Warren, Michigan 48090

OHD004260089

FAC 83-264

March 24, 1983

Mr. Valdus V. Adamkus,
Administrator
U.S. EPA, Region V
Federal Building
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Adamkus:

Attached is a copy of two delegation of authority letters sent to all GM Assembly Division Plant Managers. The delegation letters are signed by Mr. P. J. Coletta, Vice President and General Manager, GM Assembly Division, as required by the Consolidated Permit Regulations, Part 122 and the General Pretreatment Program Regulations 40 C.F.R. 403.

Please contact Mr. Gary Boszak of my staff at (313) 492-7138 concerning any questions.

L. R. Hostetter, Director
Facilities Engineering

GPB/nwb18
Attachment
cc: State Director - Michigan Dept.
of Natural Resources
State Director - Ohio Environmental
Protection Agency
State Director - Wisconsin Dept.
of Natural Resources

Inter-Organization

GM Assembly Division
General Motors Corporation
Central Office
30009 Van Dyke Avenue
Warren, Michigan 48090

Date: March 24, 1983

To: GMAD Plant Managers

Subject: DELEGATION OF AUTHORITY TO SIGN REPORTS UNDER EPA CONSOLIDATED PERMIT PROGRAM

As required under Environmental Protection Agency Consolidated Regulations, Part 122, Section 122.6, the position of Plant Manager is hereby designated as my duly authorized representative for GM Assembly Division plant facilities (see attached list).

As such, the Plant Manager is authorized to sign all reports required by permits, other information requested by the Director, and all permit applications submitted for Class II wells under Section 122.38 for the Underground Injection Control Program.

In the absence of the person occupying the designated position due to vacation, illness, or other reasons, the person emporarily responsible for the operation of the GM Assembly Division facili y or activity is my duly authorized representative.

P. J. Coletta
Vice President and General Manager

GPB/nwb18
PJC 2
cc: EPA Regional Administrators
State Directors

U.S. EPA Region V

Michigan plants:

GMAD Detroit	2500 E. Grand Boulevard Detroit, MI 48211
GMAD Orion	4555 Gidding Road Lake Orion, MI 48055
GMAD Willow Run	2625 Tyler Road Ypsilanti, MI 48197

Ohio plants:

GMAD Lordstown	2300 Hallock Young Rd., S.W. Warren, OH 44481
GMAD Norwood	4726 Smith Road Norwood, OH 45212

Wisconsin plants:

GMAD Janesville	1000 Industrial Avenue Janesville, WI 53545

U.S. EPA REGION VI

Oklahoma plants:

GMAD Oklahoma City	7447 Southeast 74th Street Oklahoma City, OK 73135

Texas plants:

GMAD Arlington	2525 E. Abram Street Arlington, TX 76010

U.S. EPA REGION VII

Missouri plants:

GMAD Leeds	6817 Stadium Drive Kansas City, Missouri 64129
GMAD Wentzville	1500 E. Route A Wentzville, Missouri 63385

Kansas plants:

GMAD Fairfax	100 Kindelberger Road Kansas City, KS 66115

Inter-Organization

GM Assembly Division
General Motors Corporation
Central Office
30009 Van Dyke Avenue
Warren, Michigan 48090

Date: March 24, 1983

To: GMAD Plant Managers

Subject: DELEGATION OF AUTHORITY TO SIGN REPORTS UNDER ENVIRONMENTAL PROGRAMS

The position of Plant Manager is hereby designated as my duly authorized representative for purposes of signing industrial user reports and future compliance monitoring reports under EPA's General Pretreatment Programs Regulations, 40 C.F.R. 403, 46 Federal Register 9439 et seq. (January 28, 1981).

In the absence of the person occupying the designated position due to vacation, illness, or other reasons, the person temporarily responsible for the operation of the facility or activity is my duly authorized representative.

P. J. Coletta
Vice President and General Manager

GPB/nwb18
PJC 1
cc: D. J. Eden, Director
Plant Environment - EAS

station 3

Re: Hamilton County
Hazardous Materials
GMAD - Norwood
OHD 004 260 089
HW 05-31-0441

GMC

Mr. Mark Endres
General Motors Assembly Division
1726 Smith Road
Norwood, Ohio 45212

NORWOOD PLANT

February 28, 1983

Dear Mr. Endres:

On 25 February 1983, T. Ontko and I inspected your facility at 1726 Smith Road to determine compliance with Federal and State hazardous waste regulations. G. Killeen, J. Disney, and you represented GMAD - Norwood.

A copy of the completed inspection form is enclosed. The following are violations found during the inspection:

1. The testing frequency and responses to any process changes that may affect the character of the waste are not described in the written waste analysis plan as required by Sections 40 Code of Federal Regulations 265.13(b) and the Ohio Administrative Code 3745-65-13(B).

2. The written inspection log does not include notations of observations and the log is not kept as an entity, individual entries are located in several different files, as required by Section 40 CFR 265.15 (d) and OAC 3745-65-15(D).

3. A spill had occurred in the South Storage Area where hazardous waste is bulked. The spill had been partially dealt with. The absorbant material had not been disposed of at the time of the inspection. Areas, such as this, subject to spills must be inspected daily at a minimum and the inspection and any remedial action resulting from the inspection must be recorded in the log as required by Sections 40 CFR 265.15(b)(4) and OAC 3745-65-15(B)(4).

4. The written Personnel Training Programs does not provide for initial training of new employees or those assigned to new positions and an annual review of the initial

DP

FILE

OhioEPA

Re: Hamilton County
Hazardous Materials Management
GMC - GM Assembly Division-Norwood Plant
Transporter, TSDF
434-HW/OHD 004260089

CERTIFIED MAIL

Mr. Gerry Killeen
General Supervisor of Engineering
GMC-GM Assembly Division
Norwwod Plant
4726 Smith Road
Norwood, Ohio 45212

January 24, 1983

Dear Mr. Killeen:

On December 21, 1982, the Ohio EPA, the Public Utilities Commission of Ohio and the U.S. Department of Transportation conducted inspections of hazardous waste transporters at the CECOS/CER secure landfill in Clermont County. On that date, a truck from your facility driven by Joseph Philpot was cited by the Public Utilities Commission of Ohio for transporting an insecure load.

The hazardous waste in bulk transit was identified on manifest #NO255 as 7.5 tons of Wastewater Treatment Hazardous Waste Solid NOS. Liquid was leaking from the rear of the truck. Mr. Philpot indicated that the seal on the door was faulty. In addition to the leakage at the rear of the truck, a portion of the top, approximately 2 feet by 6 feet, was not covered.

The Ohio EPA on-site inspector at CECOS/CER has indciated that insecure loads of hazardous waste continue to be delivered from your facility. This letter advised you that you should immediately undertake the necessary actions to rectify this recurring problem. These actions may include placing an impermeable liner inside the truck prior to bulk loading. The top of the truck must be covered to prevent access to rainwater or fugitive materails escaping during transport.

Please respond within 10 days of the date of this letter indicating the corrective actions undertaken. Failure to rectify this problem may result in this Agency recommending revocation of your hazardous waste transporters registration to the Public Utilities Commission of Ohio.

Sincerely,

Jeff Hines
Hazardous Materials Management

cc: Paula Cotter, DHMM/CO
cc: Ken Westlake, USEPA/Region V

OhioEPA

Re: GMC Assembly Division
TSDF Inspection
05-31-0441

May 5, 1982

Mr. Mark Endres
Environmental Engineer
GMC Assembly Division
1726 Smith Road
Cincinnati, Ohio 45212

Dear Mr. Endres:

On April 27, 1982 I inspected your facility for compliance with state and federal hazardous waste laws and regulations. Enclosed with this letter is a copy of this inspection report documenting violations of the hazardous waste rules. The following deficiencies were noted:

1. Lack of personnel training records containing the information required by Sections 3745-55-16 (O.A.C.) and 265.16 (C.F.R.).

2. Lack of address, home phone numbers, and office phone numbers of the emergency coordinators in the contingency plan as required by Sections 3745-55-51 (O.A.C.) and 265.51 (C.F.R.).

Correct these violations within 60 days; we will schedule a reinspection at that time. If you complete the corrections before then, you may mail them to this Office to remove violations.

Also, manage your waste solvents which are recycled as you do your other hazardous wastes including the required inspections and recordkeeping, inclusion in your contingency plan and training program, and manifesting to the recycler.

I advise you to not store drums of nonhazardous waste in poor condition with your hazardous waste drums because it causes confusion and gives a poor impression to inspectors and your own workers.

Please send this Office a copy of your contingency plan as soon as possible.

State of Ohio Environmental Protection Agency
Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402 • (513) 461-4670

James A. Rhodes, Governor
Wayne S. Nichols, Director

If you have any questions, please call this Office.

Sincerely,

Randall Marshall

Randall Marshall
Environmental Scientist
Hazardous Materials Management Section

RM/dkp

cc: Paul Cotter, DHMM/CO
cc: Bob Fragale, HWFAB/CO
cc: Kathleen Homer, USEPA/Region V

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD004260089

Facility: GMC Assembly Division Address: 1726 Smith Rd City: Norwood (Cin.)

State: Ohio Zip Code: 45212 County: Hamilton Telephone: 513-841-5102

Facility Operator: Gerry Killeen Title: Admin. of Eng. Telephone: 513-841-5102

Facility Owner: General Motors Corp. Address: 1726 Smith Rd.

City: Cincinnati State: Ohio Zip Code: 45212 Telephone: 513-841-5102

Type of Ownership: ✓ Private _____ Government State HWFAB No. 05-31-0441

Date of Inspection: Apr. 27, 1982 Time of Inspection: (Start) 9:45 (Finish) 12:30 p.m.

Advance Notification? ___ No ✓ Yes: _____

Weather Conditions: cloudy, 45°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Mark Endres	Environmental Engineer	513-841-5102
2.			
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Randall Marshall	Environmental Scientist	513-461-4670
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ✓ Generation B. ✓ Storage C. ____ Treatment D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F002, F003, F005, F007, F008, F006, F017, F018, F009

b) Non-Listed Wastes: ✓ D001 I ✓ D002 C ____ D003 R ✓ D000 T

D008

3. Has this facility submitted a Part A Permit Application? ✓ Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

____ Yes, See Remark # ____ ✓ No

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

   _____ Yes, See Remark # _____ ✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

   ✓ Yes, Complete Part 3 (Transp.) _____ No

   a) Applicable U.S. EPA I.D. Number OHP004260089

   b) Ohio P.U.C.O. GR TRSF Number haven't received yet

7. A brief description of site activity:

   Assemble automobiles

REMARKS, PART 1. (GENERAL INFORMATION)

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	√			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	√			#1
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	√			#2
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	√			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	√			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	√			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.			√	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	√			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓			
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	✓			
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	✓			
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.			✓	
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			✓	
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.				

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	___	___	___	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are dooumented (265.174 and 3745-56-54).	___	___	___	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	___	___	___	_____
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	___	___	___	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	___	___	___	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	___	___	___	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	___	___	___	_____
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓	___	___	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	___	✓	___	_____

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			✓	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

#1 - reclaim spent solvents by distillation

#2 - totally enclosed treatment system with discharge to sewer

PART 3. TRANSPORTER REQUIREMENTS

	Yes	No	N/A	Remark #
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	√			
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	√			
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	√			
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	√			
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	√			
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.			√	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).			√	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?		√		
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).			√	

	Yes	No	N/A	Remark #
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?			✓	
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?			✓	
9. Does the transporter store hazardous wastes temporarily while they are in transit?		✓		
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)			✓	

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?		✓		
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?		✓		

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	✓			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	✓			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	✓			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	✓			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	✓			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	✓			

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	√			
a) Inspect emergency equipment.	√			
b) Inspect monitoring equipment.	√			
c) Inspect security, alarm and communications devices.	√			
d) Inspect process equipment (pipes, pumps, etc.).			√	
e) Inspect containment structures (dikes, curbs, etc.).	√			
f) Inspect facility for structural malfunctions (roof, floor, etc.).	√			
g) Inspect hazardous waste handling/loading areas each day used.	√			
h) Record of any malfunctions due to equipment or operator errors.	√			
i) Record of any hazardous waste discharges.	√			
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	√			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.		√		
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	√			

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.			✓	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	✓			

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	✓			
a) Internal alarm system	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	✓			

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			✓	

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		✓		
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	✓			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).			✓	
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			✓	

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	✓			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	✓			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).			✓	
g) Records of any waste analyses and trial tests required to be performed.				
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).				
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.				
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.				
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓			

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			✓	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).			✓	

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).				
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).				
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.			✓	
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ Director within 15 days.			✓	

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.				

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.				
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.				

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	√			
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	√			
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	√			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	√			
d) A description of steps taken to decontaminate facility equipment.	√			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	√			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			√	

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	√	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	√	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	—	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	—	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	—	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	√	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	—	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	—	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	—	—

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.				

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	√			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	√			
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	√			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	√			
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	√			

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	√			

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	√			
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).			√	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	√			
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	√			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).			√	
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			√	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			√	

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	✓			
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.		✓		
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	✓			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	✓			
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).			✓	
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).			✓	

#3 - One drum of nonhazardous waste was bent, the lid was off and waste was all over the outside. This was stored with the hazardous waste.

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).				
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).				

Paul Dimock

OHD 004260089
GM Assembly Division
NORWOOD PLANT
G,T,TSD,PA.

General Motors Corporation

Norwood Plant
P.O. Box 12171
Norwood, Ohio 45212

September 24, 1981

Mr. Paul Flanigan, P.E.
Hazardous Waste Materials Management
Ohio EPA
361 East Broad Street
Columbus, Ohio 43216

Dear Mr. Flanigan: Re: Application Number 81-HW-0441
Hamilton County

In response to your letter of September 1, 1981, be advised that the following deficiencies have been corrected concerning interim status standards contained in 40CFR265:

Item No.	OAC Reference	USEPA Reference	Remarks
III. C4	3745-55-14	265.14	Danger signs have been posted in required areas.
III. D4	3745-55-15	265.15	This item was in compliance at the time inspector Boice made his visit. The written inspection schedule was reviewed on the day of the inspection.
III. D8	3745-55-15	265.15	Inspections were performed on a regular basis and will now be recorded and kept on file.
III. F2	3745-55-17	265.17	No smoking signs are posted in required areas.
VI. C1	3745-55-73	265.73	An operating record will be maintained listing the quantity and location of each hazardous waste in the required areas.

-continued-

NC-3

Item No.	OAC Reference	U.S.EPA Reference	Remarks
VIII. J5	3745-56-74	265.194	Tanks will be inspected for leakage and checked during each operating day for proper operation. These will be recorded.

Also attached is a blank copy of Norwood's operating record for inventory of wastes in the RCRA permitted storage areas.

Any questions, please contact the writer at 513/841-5102.

Very truly yours,

GM ASSEMBLY DIVISION

GM Killeen

G. M. KILLEEN
Administrator

MAE/wh
cc:
R. Boice - U.S. EPA
E. Lim - Ohio Hazardous Waste Approval Board
file

OPERATING RECORD

RA PERMITTED STORAGE AREAS

(REFERENCE 40 CFR 265.73)

Page: _____

Date: _____

WASTE NAME (HW - EPA HAZARDOUS WASTE)	QUANTITY STORED	QUANTITY SHIPPED	COMMENTS
I. BARREL AND WASTE STORAGE - SOUTH YARD:			
DRUM STORAGE: S01			
Chromium Sludge (HW) (D007)			
Lead Sludge (HW) (D008)			
Waste Adhesives (HW) (D001)			
Spent Thinner (HW) (D001)			
Spent Chlorinated Solvent (HW)(D001)			
Paint Sludge "UNKILLED" (HW)(D001)			
Waste Sealer			
Bonderite Sludge			
Asbestos			
Waste Oil			
"Partial" Sealer Drums			
Two 6000 gal. underground tanks: S02			
Spent Thinner (HW) (D001)			
Spent Chlorinated Solvent (HW)(D001)			
II. 4000 gal. Above Ground Tank - Red Label Room: S02			
Spent Thinner (HW) (D001)			
III. 12000 gal. Underground Tank - North Fire Lane: S02			
Spent Thinner (HW) (D001)			
IV. Wastewater Treatment Facility: S01			
Wastewater Treatment sludge(HW) F006			

V. DID ANY INCIDENT REQUIRE THE IMPLEMENTATION OF THE CONTINGENCY - EMERGENCY PLAN? [ ] YES, [ ] NO, IF YES, COMMENT BELOW:

VI. COMMENTS:

By: _____

Re: Application Number 81-HW-0441
Hamilton County

September 1, 1981

Mr. Gerry Killeen
General Supervising Engineer
G M C Assembly Division, Norwood Plant
4726 Smith Road
Norwood, Ohio 45212

Dear Mr. Killeen:

On July 20, 1981, Richard Boice of the U.S. EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Richard Boice, U.S. EPA, Region V
Tom Winston, SWDO

CERTIFIED MAIL

STATE IDENTIFICATION NUMBER
(If Applicable)

81-HW-0441

OHD004260089
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: General Motors Assembly Div — Norwood Plant

(B) Street: 4726 Smith Rd.

(C) City: Cincinnati (mailing) Norwood (location) (D) State: Ohio (E) Zip Code: 45212

(F) Phone: (513) 841-5102 (G) County: Hamilton

(H) Operator: Same as A-G above

(I) Street:

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: Same as A-G above

(P) Street:

(Q) City: (R) State: (S) Zip Code:

(T) Phone: (U) County:

(V) Date of Inspection: 7/20/81 (W) Time of Inspection (From) 10:00AM (To) 2:30PM

(X) Weather Conditions: overcast; 85°F; high humidity

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Mark Endres	Engineer	(513) 841-5102
Gerry Killeen	Administrator	(513) 841-5102

(Z) Inspection Participants	Agency/Title	Telephone
Richard E. Boice	USEPA/Env. Engr.	(312) 886-6220

(AA) Preparer Information

Name	Agency/Title	Telephone
Richard E. Boice	USEPA/Env. Engr.	(312) 886-6220

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

✓ A. Storage and/or Treatment
- ✓ 1. Containers (I)
- ✓ 2. Tanks (J)
- 3. Surface Impoundments (K)
- 4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

~~E.~~ Chemical, Physical, and Biological Treatment (Q)
deleted 8/28/81

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

I. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	___	___	___	NA
2. Facility expansion?	___	___	___	NA
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	___	___	Waste characteristics are known from the process & materials from which generated. WWTP effluent & sludge is regularly analyzed,
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	___	___	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	___	___	NA No hazardous wastes are accepted from off-site.
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X	___	___	
2. Artificial or natural barrier around facility?	X	___	___	
3. Controlled entry?	X	___	___	
4. Danger sign(s) at entrance?	___	X	___	(1)
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X	___	___	seldom occurs
2. Records of operator error?	X	___	___	seldom occurs
3. Records of discharges?	X	___	___	seldom occurs

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	X	---	(2)
5. Safety, emergency equipment?	X	---	---	
6. Security devices?	X	---	---	
7. Operating and structural devices?	X	---	---	
8. Inspection log?	---	X	---	(2)
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X	---	---	Plant security is trained for emergency response.
2. Job descriptions?	X	---	---	
3. Description of training?	X	---	---	
4. Records of training?	X	---	---	
5. Have facility personnel received required training by 5-19-81?	X	---	---	
6. Do new personnel receive required training within six months?	X	---	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X	---	---	
2. No smoking signs?	---	X	---	(3)
3. Separation and protection from ignition sources?	X	---	---	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X			
2. Telephone or 2-way radios at the scene of operations?	X			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			Security takes care of most of this maintenance
2. Is emergency equipment maintained in operable conditions?	X			"
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X			Voice & visual contact.

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X ___ ___ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			Security takes care of coordination.
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			Was given to local hospital & Fire Dept.
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				NA

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

No hazardous wastes are accepted from off-site.

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?				
2. Are records of past shipments retained for 3 years?				
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?		X	(4)
2.	Does the operating record contain the following information:			
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X		
c.	The location and quantity of each hazardous waste within the facility?		X	(4)
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)			NA
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X		
f.	Reports detailing all incidents that required implementation of the Contingency Plan?			NA
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	X		

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			
2. Has this plan been submitted to the Regional Administrator		X		
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?	X			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: General Motors Assembly Div., Norwood Plant Date of Inspection: 7/20/81

South Yard container storage

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			One barrel marked methylene chloride was badly bent.
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	—	NA
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	—	—	—	NA

J
TANKS

Facility Name: General Motors Assembly Div — Norwood Plant Date of Inspection: 7/20/81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X	—	—	
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	—	—	—	NA
3. Do continuous feed systems have a waste-feed cutoff?	—	—	—	NA
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	—	—	—	NA
5. Are required daily and weekly inspections done?	—	X	—	(2)
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	X	—	—	
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	—	NA

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 4000 gallons

Tank diameter: _____ feet

Distance of tank from property line 100 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

This is Red Label Room Tank. The North Fine Lane tanks and South Yard tank are underground tanks.

K
SURFACE IMPOUNDMENTS NA

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

* Facility Name: General Motors Assembly Div. — Norwood Plant

Date of Inspection: 7/20/81

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	X	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	X	___	___	_____

*Not Inspected

* Hydrofax package treatment system for treatment of chromic acid by neutralization, reduction of Cr^{+6} to Cr^{+3}, precipation, flocculation and filtration,

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	NA Waste stream should not change
4. Are inspection procedures followed according to 265.403?	X	___	___	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	NA
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	X	___	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	X			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6. The total quantity of waste(s) and the type and number of containers loaded?	X			
7. Required certification?	X			
8. Required signatures?	X			
(C) Does the owner or operator submit exception reports when needed?	X			Not needed so far.

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)			X	Barrels were not ready for shipment.
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)			X	"
(C) If required, are placards available to transporters of hazardous waste?	X			

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			
(B) Has the generator submitted Annual Reports and Exception Reports as required?				NA

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	X			

II. INTERNATIOINAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?				NA
B. Are signed completed manifest(s) on file?				NA

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?		X		
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		X		

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Following are further explanations of items numbered on the form:

(1) All hazardous waste storage and treatment sites were within the fenced and controlled access area of the plant. However, danger signs were not present at the hazardous waste storage and treatment sites.

(2) There was not a written inspection schedule or log for the hazardous waste tank and container storage. However, these storage areas are reportedly checked daily by the sanitation foreman who should record any leakage. The underground tanks are not regularly inspected but may be checked during down times. The sludge trucks are checked for leaks prior to transport, but this is not recorded.

(3) "No smoking" signs were not present in the South fuel storage area or near the tanks that store ignitable wastes.

(4) A record is not kept of hazardous waste storage in the South fuel area. In fact, the representatives were unable to tell me which barrels contained hazardous waste and which did not.

Please refer to Part III of the Part A application for this facility. Following are descriptions of the wastes listed.

F002 – Spent solvent used for cleaning. The solvent is a mixture of 25% methylene chloride and 75% mineral spirits.

F003
F005 – Paint thinners, includes a combination of solvents.

F017 – Temporarily suspended.

F007
F008] –? Because of the amended definitions, these wastes are not generated at this facility.

F006 –?, Sludge from the industrial wastewater treatment plant. Besides treating electroplating wastewater, the plant handles wastewater from the paint spray booth, caustic stripping, carwash, chrome treatment, lead soldering and gasoline fill-up area. Analytical results showed the sludge to be high in lead, chromium and cyanide. However, an EP toxicity test has not been run on it.

F018 – Temporarily suspended.

D001 – Solvents from general cleaning, purge of spray guns, waste gasoline and adhesives. Liquids are sent to a reclaimer or to the Cincinnati Municipal Incinerator.

D002 – Caustic from the strip tank.

D008 – Lead droppings from the solder booth. Mr. Killeen said that this waste should be eliminated in a year or so when complete the switch to entirely bodies.

F007
F009
F017
D001
D002
D008

] ? all these hazardous waste numbers were to apply to the effluent from the plant wastewater treatment facility. Actually the effluent is not a RCRA hazardous waste. F007 and F009 are not generated because cyanides are not used in the process. F017 is temporarily suspended. The inputs to the wastewater treatment facility that could be characterized by D001, D002 and D008 are minor, and the effluent itself does not exhibit these characteristics. Furthermore the wastewater treatment plant itself is excluded from RCRA regulation in accordance with 265.1(c)(10) because it is covered by pretreatment standards.

D007— This waste is not listed in the Part A application, but it is generated in small quantities. This is a spent chromic acid and is treated on-site.

Following is a description of the hazardous waste storage and treatment areas in this facility including my observations during the on-site inspection.

I. Earth yard container and tank storage area: There are two 6000 gallon underground tanks for storage of flammable liquids. A berm separates the tank opening from the surface. The container storage area was being used to clean equipment during my inspection. This area is curbed and equipped with a sump that discharges to the wastewater treatment facility.

at the time of my inspection the container wastes were being stored in large bins that would catch any leakage. Mr. Endres could not tell me which barrels held hazardous wastes and which did not. Some barrels did not have labels, but Mr. Endres thought that these barrels held non-hazardous wastes. One barrel was badly bent and was labeled "methylene chloride." Mr. Endres was unsure whether it really contained methylene chloride.

II. Red Label Room 4000 gallon tank:
When put into operation the tank will hold spent paint thinner. Inasmuch as the company plans to recycle this waste, it will probably be excluded from RCRA regulation.

III. Industrial wastewater treatment plant:
Sludge from this plant is a listed hazardous waste (F006). Analytical results also show high lead,

chromium and cyanide, but it has not been tested for EP toxicity. The wastewater flows through a pretreatment chamber where the sludge is removed continuously and conveyed into a sludge truck. When the sludge truck is full it is driven to a landfill. From the pretreatment the wastewater is accumulated in tanks where it is analyzed prior to discharge to the sewer system.

IV. North fire line underground tank storage: There are three 12,500 gallon underground tanks at this location, but only one is used. Spent paint thinner is stored here, but use will be discontinued when the new ones in the south yard area becomes fully operational.

V. Chromic acid treatment system:

This system neutralizes chromic acid, converts it to the trivalent form, precipitates it and filters the effluent. It is a hydrofax package plant.

RCRA HAZARDOUS WASTE MANAGEMENT FACILITY CLOSURE PLAN

Section 1. Introduction:

Under the U.S. EPA regulations, 40 CFR Part 265, Subpart G. Sections 265.110 thru 265.120, each facility which stores, treats, or disposes of hazardous wastes must have a Closure Plan on file. This Closure Plan has been prepared to cover the following facility:

A. Facility Location: General Motors Corporation
C-P-C Group Norwood Plant
4726 Smith Road
Norwood, Ohio 45212

B. Identification Number: EPA No. OHD004260089
Ohio Permit No. 05-31-0441

C. This Plan has been prepared by:
Mark A. Endres, Plant Engineer
Date: 5-18-81

D. This Plan has been revised by:
M.A. Endres, 3-21-83
W.H. Stanley, 4-16-87
W.H. Stanley, 7-1-87 (per OEPA comments)

E. RCRA permitted hazardous waste storage and treatment facility at G.M. Plant, Norwood, Ohio. The areas of the Norwood Plant that are permitted under RCRA as hazardous waste storage facilities along with the type of waste handled are listed on page four.

F. The G.M. Norwood plant is located in southwest Ohio within the city of Norwood. See Figure "A" The plant has approximately Two million Square feet of area, dedicated to the assembly of the Chevrolet Camaro and Pontiac Firebird.

The manufacturing operations at the G.M. Norwood facility consist of four major production departments: Body, Paint, Trim and Chassis. Each department consist of a main conveyor line supported by sub assembly operations contributing to the assembly of a complete automobile.

The basic operations performed in each department are as follows:

Body department. Assemble sheet metal parts into basic automobile bodies.

Paint department. Prepare the body for painting, paints and seals the body.

Trim department. Assemble trim components to the body. Trim parts consist of wiring, glass, carpet, seats, door and quarter pads.

Chassis department. Assemble the drive train items to the automobile body. Items such as axles, springs, transmissions, engines and suspension equipment.

General Motors Norwood will cease production operations on August 26, 1987. During the months of September and October equipment will be removed and general clean up will be scheduled. It is anticipated that all operations that generate hazardous waste will cease by October 31, 1987.

HAZARDOUS WASTE STORAGE / TREATMENT UNITS:
GMC-NORWOOD PLANT
CPC GROUP

AREA	LOCATION	MATERIAL	EPA HAZARD	DOT HAZARD
Hazardous Waste Storage Figure "D"	Drum Storage South yard	Spent Paint Thinner	D001	Flammable
		Spent Chlotinated Solvent	F001	Flammable
		Waste Adhesive	D001	Flammable
		Chromium Sludge	D007	
		Waste Solder	D008	
Underground Storage Tanks Figure "E"	South yard	Spent Paint Thinner	D001	Flammable
		Spent Chlotinated Solvent	F001	Flammable
	Paint Trap	Spent Paint	D001	Flammable
Figure "F"	North Fire Lane	Spent Paint Thinner	D001	Flammable
Aboveground Storage Tank Figure "C"	Red Label Room	Spent Paint Thinner	D001	Flammable
Wastewater Treatment Figure "B"	Wastewater Treatment Plant	Wastewater Treatment Sludge	**	

** The EPA issued an Interpretative Rule on December 2, 1986 clarifying its position on F006 wastes (wastewater treatment sludge from electroplating operations). In that ruling the EPA indicated that conversion coating processes (phosphating) is no longer included in the F006 listing.

Section 2. Maximum Waste Inventory:

The following table shows the maximum quantity of wastes for a given area:

a. Barrel Storage area:

Spent paint thinner	100 drums
Spent chlorinated solvent	50 drums
Waste adhesive	20 drums
* Chromium sludge	0 drums
* Waste solder	0 drums

b. Underground Storage Tanks

Spent paint thinner	12000 gallons
Spent paint thinner	6000 gallons
Chlorinated solvent tank	6000 gallons
Waste Paint	2000 gallons

c. Aboveground Storage Tank

Spent paint thinner	4100 gallons

e. Waste water treatment system

Waste water treatment sludge	50 tons

* Quantities were reduced by technological improvements.

Section 3. Schedule For Closure:

The waste storage areas located within this facility are directly related to the production activities of this plant. The closure of the RCRA regulated facilities will occur after production operations are discontinued on or about August 26, 1987 or no later than 90 days after receipt of the final volume of hazardous waste.

Therefore, for compliance with the hazardous waste regulations, the year of closure is 1987. The date closure of the RCRA facilities will commence is on or about November 1, 1987. This plan will be submitted to the Director of the Ohio EPA at least 180 days before the closure is to begin.

Anticipated Closure Schedule:

Day	
1	Receipt of Final Inventory of Hazardous Waste
20	Remove drummed waste inventory to approved off site facility
25	Content of hazardous waste storage tanks removed and shipped to approved off site facility
60	Remove, dismantle, decommission underground storage tanks
65	Sample/analyze soil in area of underground storage tanks
85	Backfill area of tank excavation following verification of contaminated soil removal.
100	Cut up and dispose of removed tanks
165	Decontaminate hazardous waste drums storage area
175	Sample/analyze hazardous waste drum storage area
180	Closure complete
210	Certification of closure. Submitted to U.S. EPA/OEPA

* Following closure as a TSD facility, although production will have ceased, GMC-CPC may generate some hazardous waste during plant decommissioning activity. As a result we may function occasionally as a generator storing for less than 90 days.

Section 4. INVENTORY DISPOSAL, REMOVAL OR DECONTAMINATION OF EQUIPMENT/TANKS:

General:

Closure activities for all units will begin by removal of all the waste inventory to appropriate off site treatment, storage and disposal facilities. Following waste inventory removal closure activities in each of the storage, activities will include decontamination, and removal of equipment, auxiliary units and containment systems. Sampling and analysis will be conducted to verify that decontamination has been effective at each of the hazardous waste management units of the facility. Where decontamination cannot be effected, the contaminated material or equipment determined to be hazardous as a result of testing, will be managed as a hazardous waste, at an appropriate off site facility.

All piping to and from storage tanks will be dismantled and decontaminated. Where plugging has occurred which would hamper decontamination the item will be disposed of as a hazardous waste. Pumping equipment will be thoroughly steamed cleaned and either sold for scrap or if saleable removed for re-use. Some structures and equipment may be cleaned and left in place at the facility.

Decontamination will be accomplished by the most suitable and effective of the following techniques: steam cleaning, hydroblasting and mechanical scraping where necessary. Waste washwater generated as a result of decontamination procedures will be removed from the cleaning area by vacuum equipment or pumps.

Appropriate personnel protection will be utilized during closure operations, consistent with NIOSH regulations in effect at the time closure is implemented. Where necessary, organic vapor and acid gas respirators will be used. Where the possibility exists for combustible gas/oxygen meters. Non-sparking tools will be available should their use be warranted.

All samples will be analyzed using methods specified in SW-846 "Test Methods for Evaluating Solid Wastes" or, in the absence of a method specified in SW-846, other EPA accepted methods. An experienced analytical lab will analyze all samples. GMC utilizes numerous labs all of which are U.S. EPA contracted labs or labs which successfully participate in U.S. EPA's Drinking Water Laboratory Certification Program.

All work will be performed and supervised using qualified personnel. All outside contractors will be evaluated for experience and competency in decontamination procedures.

Visual observations of equipment and surfaces during cleaning will provide primary indication of decontamination. The clean standard for the tanks and containment surfaces (flooring, sumps, walls, curbs) will be to accomplish removal of all visible contamination. If rinsing or power washing is required, the clean standard will be to achieve 1 ng/l in the rinse state for any RCRA-listed solvent and less than(10X) ten times drinking water standards for metals. Appropriate repeat rinsing and sampling/analysis will be conducted until clean standards are met.

GMC will sample soils in the tank excavations and in the drum storage area as described in the sections which follow. The "clean standards" for soils will be the hazardous waste standard for EP toxicity, using the Toxic Characteristic Lehate Procedure (TCLP) as proposed in the federal regulations June 13, 1986.

4-1 Closure of underground Storage Tanks:

All hazardous wastes and residues will be removed from tank units and tank appurtenances at closure. Tanks will be decontaminated and sold for re-use or scrap. Tank piping and appurtenances will be decontaminated and sold as scrap or disposed as hazardous waste. Appropriate tank entry procedures and personnel protection will be utilized during tank closure operations.

1. The waste solvents will be removed from the tanks, and will be transported and managed by the following method.

   Spent paint thinner will be processed by an off site TSD facility such as the Michigan Recovery systems inc., EPA ID MID060975844 or Petro-Chem Processing Inc. EPA ID MI 980615298 The transporter will be K & D Industrial Services. EPA ID MI 72790710. or some other transporter registered in Ohio and with U. S. EPA.

2. The tank atmosphere will be checked for oxygen levels and lower explosion limits prior to tank removal.

3. The tank shall be removed with a backhoe or small hydraulic crane and placed on plastic sheet. Soil will be removed to the level of the tank bottom.

4. Visual inspections will be made of the tank bed. This check will be for any signs of leakage or seepage of hazardous waste. The contractor will take samples from the excavated soils removed by the backhoe following tank removal. The excavation will not be entered unless proper safety precautions are followed.

5. The sampling locations will be four samples per excavation.

6. The soil, including visibly contaminated soil, will be excavated and stockpiled on plastic sheet. The soil will be sampled and analyzed for the hazardous constituents contained in the waste stored in that tank. (Mineral spirits, F-001 chlorinated solvents, E.P. metals).

7. If the soil sample analytical results are less than the clean standard for contamination, the contractor will use the stockpiled material (if suitable for compaction) to backfill the excavated site. Additional clean backfill will be brought in from an off site source of clean backfill to bring the area up to grade.

8. If the soil sample analytical results exceed the clean levels the contractor will remove approximately twelve inches (12") of soil and take additional samples. It is assumed that only minor contamination will exist such that all contaminated soil can be identified and removed with only one or two rounds of sampling. This assumption is based on our conclusion from use and observation of the tanks, that these tanks are sound.

9. During the course of the investigation if it is determined the contractor cannot remove all the contaminated soil then an amended closure plan will be submitted to U.S. E.P.A. and Ohio E.P.A.

10. At the surface, the tank will again be ventilated and the atmosphere in the tank will be tested as noted above.

    The tank will then be cold-cut using shears to provide access and observation ports. Remaining hazardous waste residues or sludge will be scraped or shovelled from the tank at the surface while the tank is still located on the plastic sheet or the tank may be moved to the diked containment area at the facility where it will be scraped and steam cleaned or power washed as necessary. Some sludge residues may be stabilized using portland cement prior to placement in a drum. R.C.R.A. disposal restrictions will be complied with. The final decontamination method and location will be dependent on the exact condition of the tank, the nature of the residues and the contractors judgement as to whether or not the tank can be safely moved. All decontamination washwaters will be contained and evaluated analytically for off site management at a commercial wastewater treatment facility or on-site management in our wastewater treatment facility.

    Following decontamination, the tanks will be cut up and removed off-site to a scrap yard.

    Associated pipes and fitting will be appropriately decontaminated and managed as scrap. If it is not feasible to decontaminate the piping it will be managed as a hazardous waste at an off site T.S.D. facility.

4-2 Closure of Above Ground Storage Tank

1. The waste solvents will be removed from the tanks, and will be transported and managed by the following method.

   Spent paint thinner will be processed by an off site TSD facility such as the Michigan Recovery System Inc., EPA ID MI D060975844 or Petro-Chem Processing Inc. EPA ID MI 980615298. The transporter will be K & D Industrial Services. EPA ID MI 72790710 or some other transporter registered in Ohio and with U.S. EPA.

2. The tank atmosphere will be checked for oxygen levels and lower explosion limits prior to tank removal.

3. The tank will be cold cut using hydraulic shears.

4. The residue will be scraped from the inner wall, placed in fifty-five (55) gallon drums for off site management as a hazardous waste.

5. The tank will be moved to the diked containment area or a bermed area with plastic sheet and the tank will then be cleaned using steam or a high pressure water wash, the wash-waters will be collected and managed on site in the facility wastewater treatment unit or it will be transported to an off site commercial wastewater treatment facility. Management options for washwaters will be determined based on analytical results.

6. Following decontamination, the tank will be cut up and removed to a scrap yard.

4-3 Closure of Drum Storage Area

1. The drum storage inventory will be removed to an appropriate off site T.S.D. facility. This inventory removal activity is essentially no different than the on-going waste packaging, labeling and shipping activity which occurs at the plant during the operating life of the facility.

2. Following inventory removal, the storage area will be inspected for obvious signs of spills or leaks or cracks in the surface. It is not expected that significant spillage or leakage will be discovered since G.M.C.-C.P.C. has complied with inspection and contingency plan requirements with respect to the drum storage area.

3. If visible spills or leaks are observed, the affected area will be wiped, scraped or brushed to remove the material from the surface of the storage pad or related structures. The material will be placed in a drum and managed as a hazardous waste.

4. Areas where cracks are found will be investigated by removal of a portion of the adjacent surfacing material with hand tools or a coring machine. Subsurface soils will be sampled and analyzed for the hazardous constituents contained in the waste stored on the pad, specifically chrome, lead, thinner and F-001 chlorinated solvents.

5. If contamination is found near the crack, then a ten foot (10') by ten foot (10') area of the pad surface around the original sampling point will be removed and four (4) additional samples will be collected and analyzed to determine the area extent of contamination which has escaped through the crack. Soil removal and re-sampling will occur until clean standards are met or until it is determined that no further removal is feasible, in which case an amendment to this closure plan will be submitted to Ohio E.P.A. and U.S. E.P.A.

6. Last of all the surface of the storage pad will be power washed or steam cleaned. This will occur after removal of visible contamination and after evaluation of releases through cracks (if any). The surface will have been prepared or covered such that run off can be contained and collected. Washwaters will be sampled and analyzed to assure clean standards have been met. If not, the cleaning procedures will be repeated and the washwaters re-sampled and analyzed.

7. Washwaters will be appropriately managed on-site in the wastewater treatment facility or off-site at a commercial wastewater treatment.

4-4 Closure of Wastewater Treatment Facility

The wastewater treatment facility is not a R.C.R.A. "wastewater treatment unit" and is not subject to R.C.R.A. interim status standards or to the Ohio Administrative Code interim standards. Following closure of the regulated units, G.M.C.-C.P.C. will submit appropriate interim status and permit withdrawal requests to Ohio E.P.A. and U.S. E.P.A.

5.0 Closure Certification

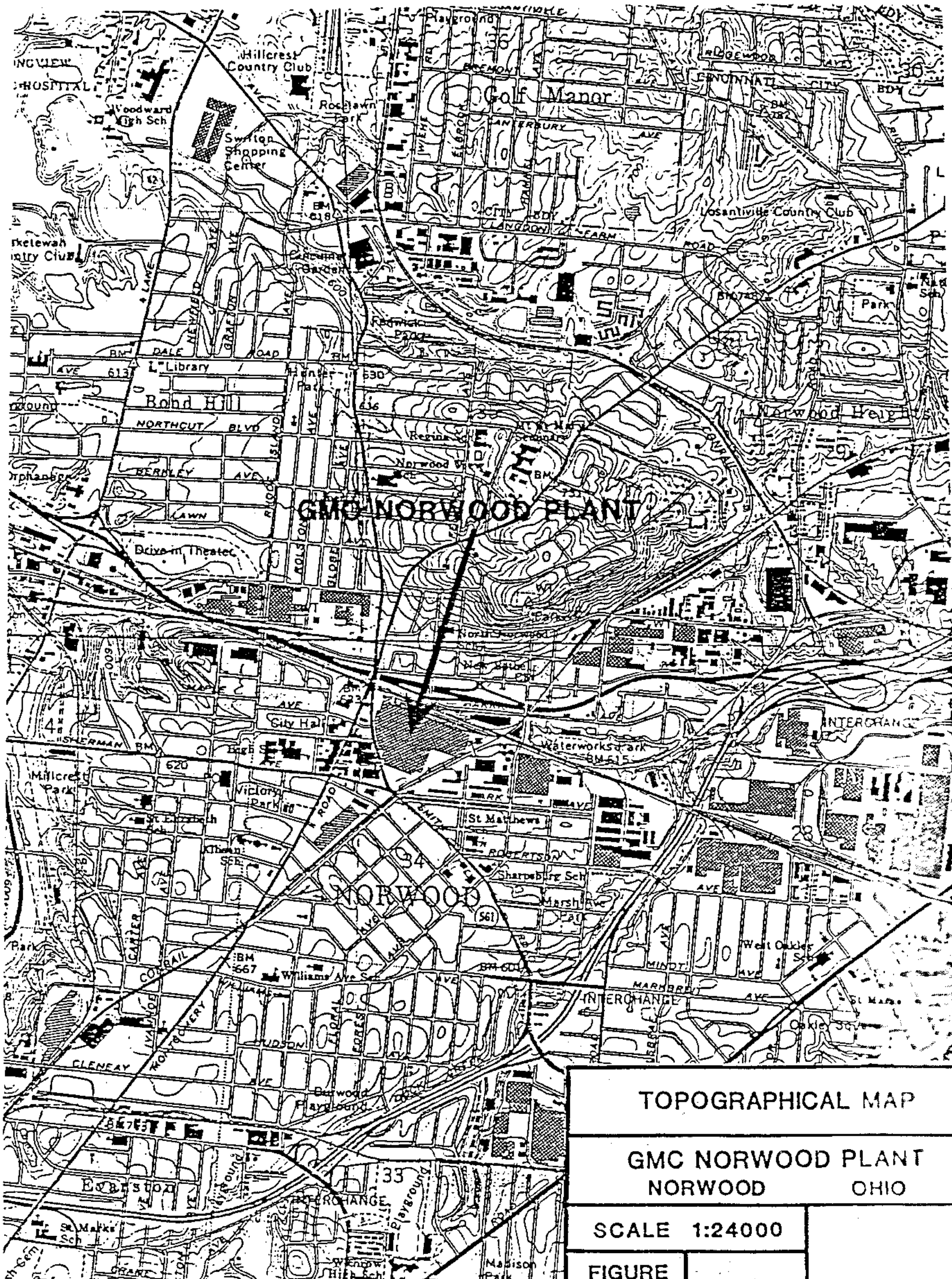
An independent registered professional engineer will be engaged by General Motors Corporation to inspect the closure activity and certify the R.C.R.A. facility has been closed in accordance with the closure plan. General Motors Corporation, will also provide certification of closure in accordance with the approved closure plan.

6.0 Cost Estimate for Closure

Estimated cost of closure for G.M. Norwood R.C.R.A. facility is $241,700.

Cost Estimate by Task

Task	Figure	Cost
Tank North Fire Lane	"F"	$35,501.00
Paint Trap East of Vault	"E"	34,467.00
Chlorinated and Thinner Tank West of Vault	"E"	63,138.00
Tank Red Label Room	"C"	12,140.00
Decontaminate Red Label Room	"C"	34,252.00
Decontaminate Barrel Storage	"D"	61,502.00

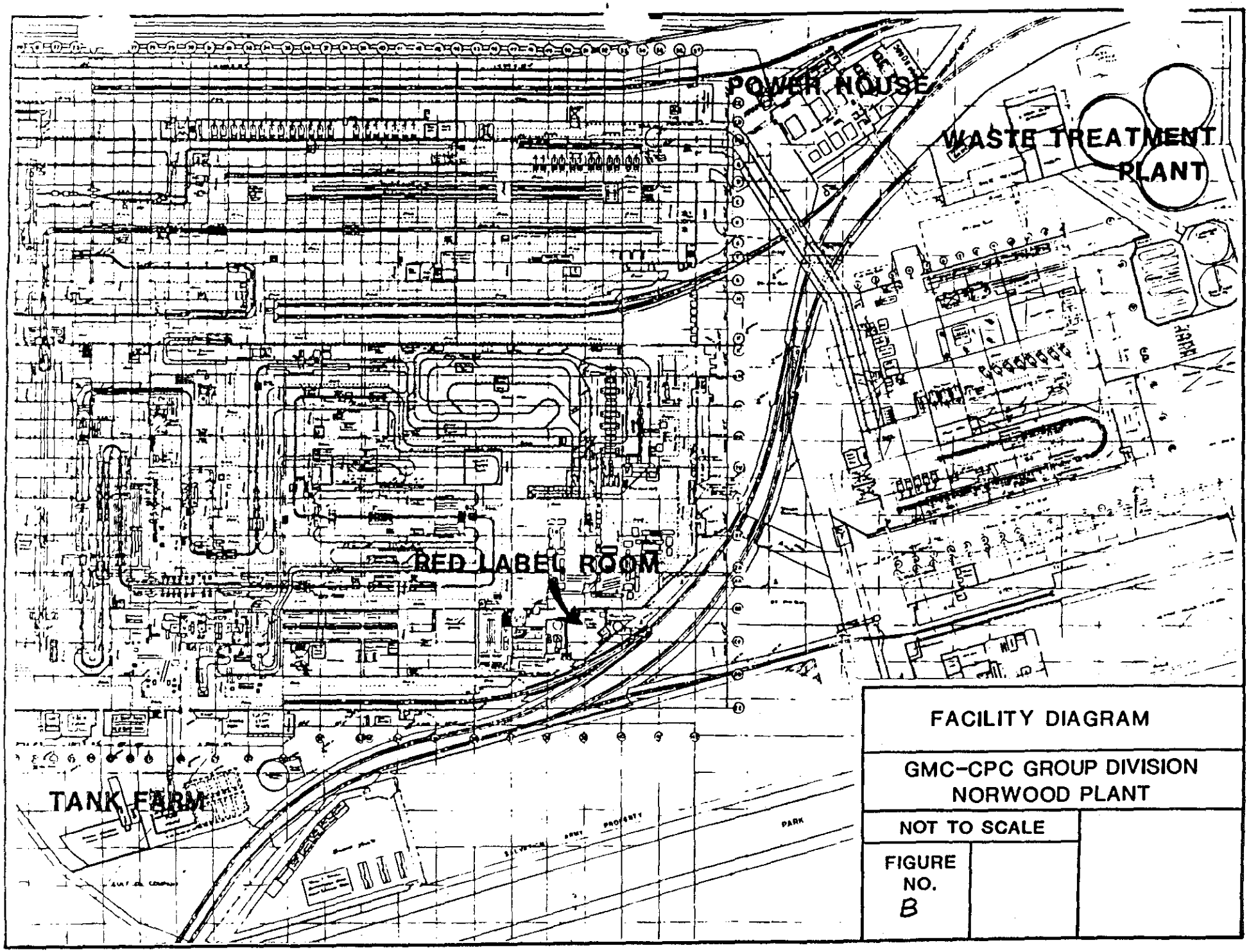


TOPOGRAPHICAL MAP

GMC NORWOOD PLANT
NORWOOD OHIO

SCALE 1:24000

FIGURE NO. A

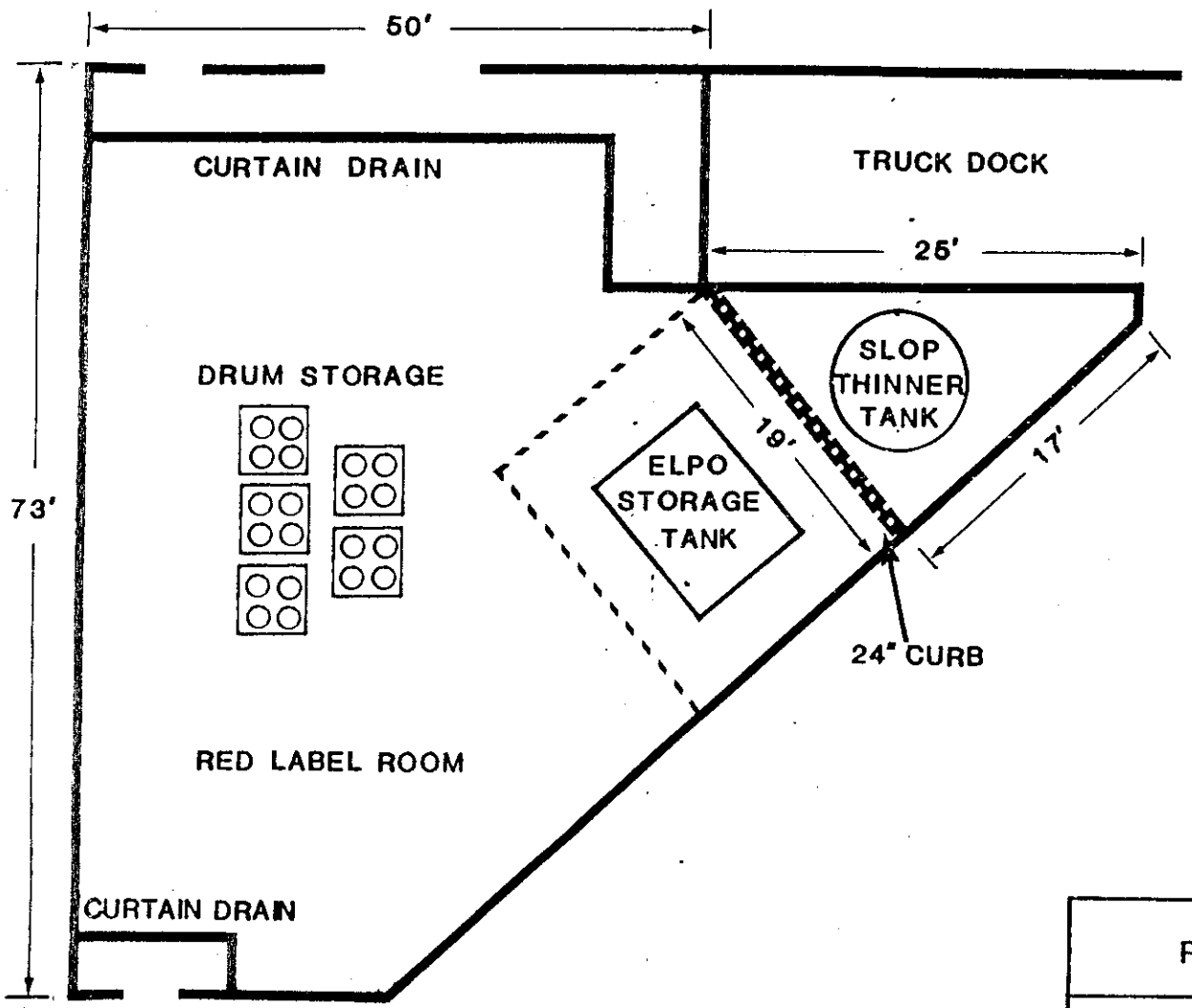


FACILITY DIAGRAM

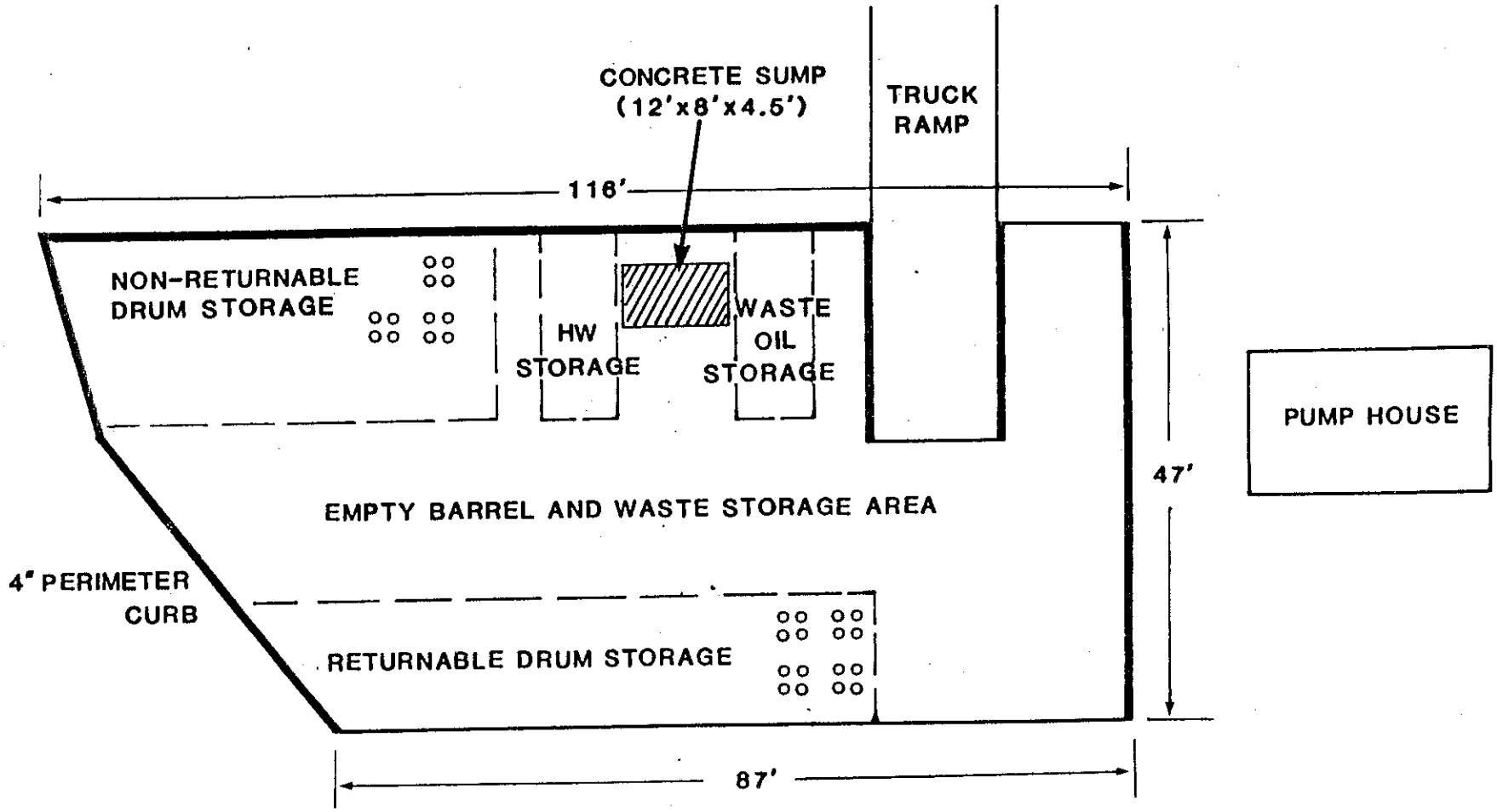
GMC–CPC GROUP DIVISION
NORWOOD PLANT

NOT TO SCALE

FIGURE NO. *B*



RED LABEL ROOM		
GMC-CPC GROUP DIVISION NORWOOD PLANT		
NOT TO SCALE		
FIGURE NO. C		

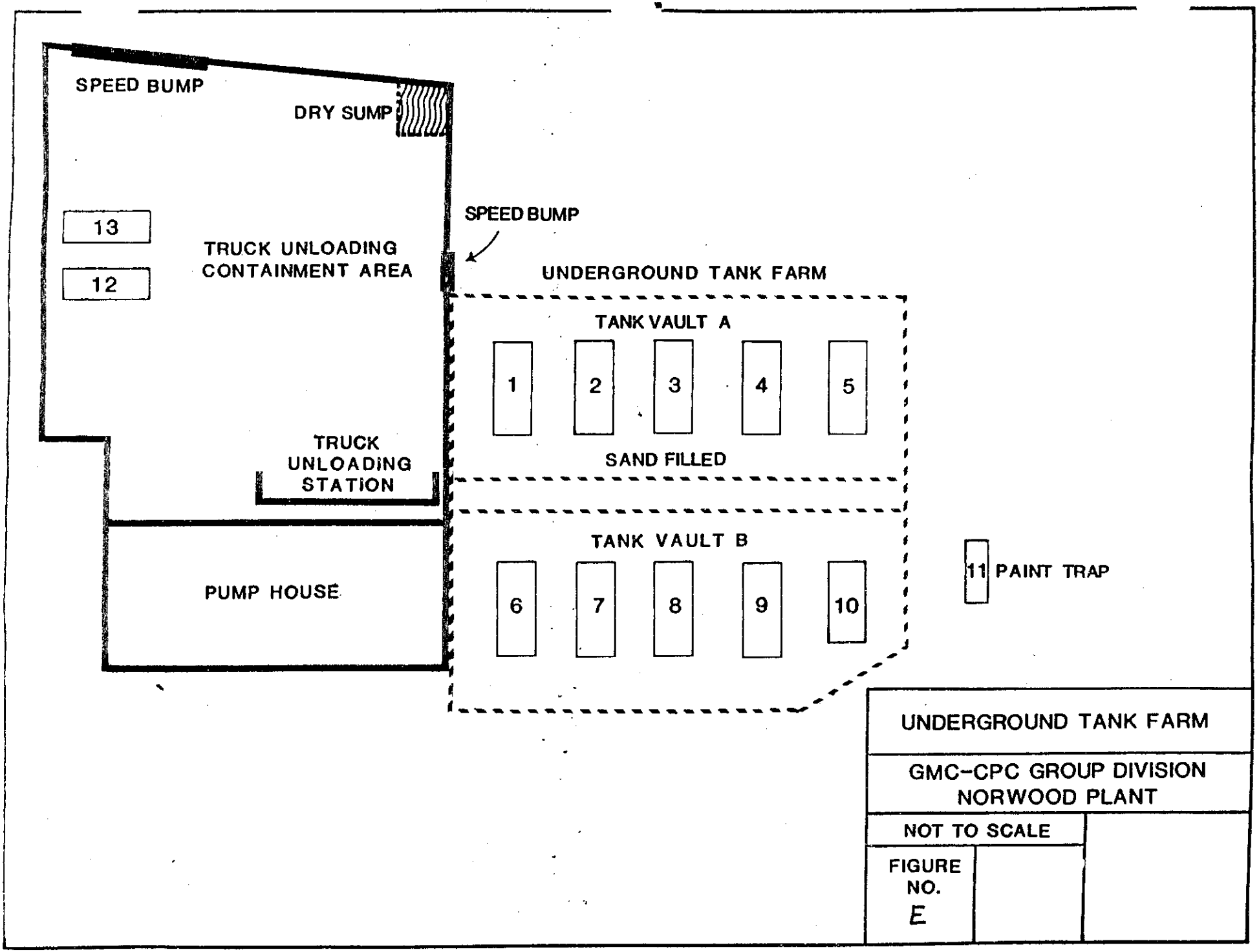


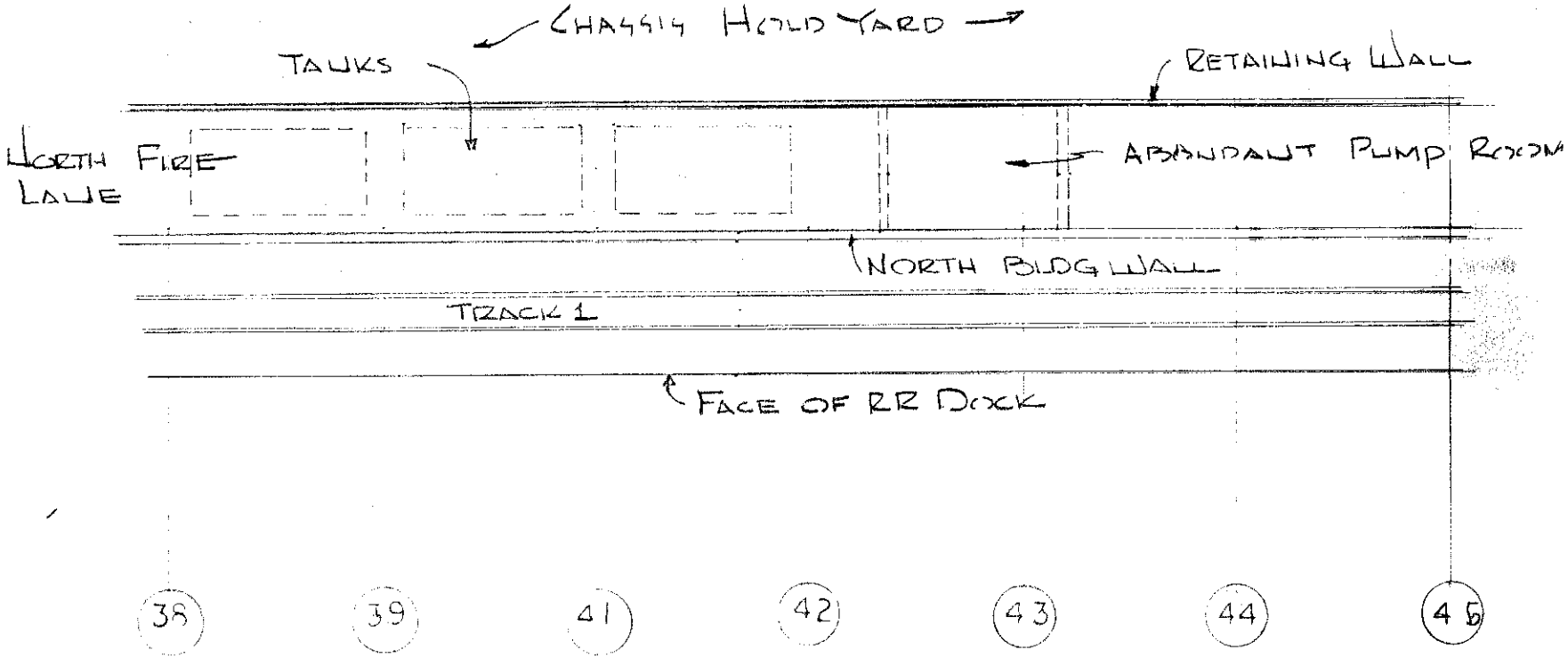
BARREL AND WASTE STORAGE

GMC-CPC GROUP DIVISION
NORWOOD PLANT

NOT TO SCALE

FIGURE
NO.
D


SPEED BUMP
DRY SUMP
13
12
TRUCK UNLOADING CONTAINMENT AREA
SPEED BUMP
UNDERGROUND TANK FARM
TANK VAULT A
1
2
3
4
5
SAND FILLED
TRUCK UNLOADING STATION
TANK VAULT B
6
7
8
9
10
11 PAINT TRAP
PUMP HOUSE
UNDERGROUND TANK FARM
GMC-CPC GROUP DIVISION
NORWOOD PLANT
NOT TO SCALE
FIGURE NO.
E



UNDERGROUND TANKS NORTH FIRE LANE
GMC-CPC-GROUP - NORWOOD PLANT
NOT TO SCALE
FIG NO F

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-NW-0441
OWNER - General Motors Assembly Div. - Norwood Plant
FACILITY NAME - GM Assembly Div. - Norwood Plant
FACILITY LOCATION - 4726 Smith Road, Norwood, Ohio
FACILITY CONTACT - Dan Killeen PHONE NO. -
ISS INSPECTION DATE - 7/20/81

Page	COLUMN I Item No.			COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III	A	1	3745-55-12(A)	265.12 (A)			
			2					
		B	1	3745-55-13	265.13		✓	
			2	3745-55-13	265.13			
			3	"	"		✓	
		C	1	3745-55-14	265.14			
			2	"	"			
			3	"	"			
			4	"	"	B	✓	
		D	1	3745-55-15	265.15			
			2	"	"			
			3	"	"			
4			4	"	"	B		
			5	"	"			
			6	"	"			
			7	"	"			
			8	"	"	B	✓	
		E	1	3745-55-16	265.16		✓	
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
			6	"	"			
		F	1	3745-55-17	265.17			
			2	"	"	B	✓	
			3	"	"			
5	IV	A	1	3745-55-31	265.31			
		B	1	3745-55-32	265.32			
			2	"	"			
			3	"	"			
		C	1	3745-55-33	265.33		✓	
			2	"	"			
		D	1	3745-55-34	265.34		✓	
6		E		3795-55-35	265.35			
	V	A	1	3745-55-52	265.52			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
		A	2	3745-55-52	265.52		✓	
			3	"	"			
			4	"	"			
			5	"	"			
7		B	1	3745-55-53	265.53		✓	
		C	1	3745-55-55	265.55			
			2	"	"			
			3	"	"			
		D	1	3745-55-56	265.56			
	VI	A	1	3745-55-71	265.71			
			2	"	"			
		B	1	3745-55-72	265.72			
8		C	1	3745-55-73	265.73	B	✓	
			2b	"	"			
			c	"	"	B	✓	
			d	"	"			
			e	"	"			
			f	"	"			
			g	"	"			
9	VII	A	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142			
		B	1	3745-56-09	265.118			
	VIII	I	1	3745-56-51	265.171		✓	
			2	3745-56-52	265.172			
			3	3745-56-53	265.173			
			4	"	"			
			5	3745-56-54	265.174			
			6	3745-56-56	265.176			
10			7	3745-56-57	265.177			
			8	"	"			
		J	1	3745-56-72	265-192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265-193			
			5	3745-56-74	265.194	B	✓	
			6	3745-56-78	265.198			
			7	3745-56-79	265.199			
11			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
			7	3745-57-11	265.230			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12		L	1	3745-57-31	265.251			
			2	3745-57-32	265.252			
			3		265.258			
			4	3745-57-36	265.256			
			5	"	"			
			6	3745-57-37	265.257			
			7	3745-57-37	265.257			
13		M	1	3745-57-52	265.272			
			2	"	"			
			3	3745-57-53	265.273			
			4	3745-57-56	265.276			
			5	3745-57-58	265.278			
			6	3745-57-58	265.278			
			7	3745-57-59	265.279			
			8	3745-57-61	265.281			
			9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302			
			2	"	"			
			3	"	"			
			4	"	"			
		B	1	3745-57-79	265.309			
			2	"	"			
		C	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.192			
		D	1	3745-57-82	265.312			
15				3745-55-17	265.17(b)			
		E	1	3745-57-83	265.313			
			2	3745-55-17	265.17(b)			
		F	1	3745-57-84	265.314			
			2	"	"			
			3	"	"			
			4	"	"			
		G	1	3745-57-85	265.315			
16		O&P						
	I	B	1	3745-58-33	265.373			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
	II	A	1a	3745-58-35	265.375			
			b	"	"			
			c	"	"			
17								
			2a	3745-58-35	265.375			
			b	"	"			
		B	1	"	"			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III	A	1	3745-58-37	265.377			
		B	1	"	"			
		C	1	"	"			
		D	1	"	"			
		E	1	"	"			
		F	1	"	"			
		G	1	"	"			
18	IV	A	1	3745-58-42	265.382			
			2	"	"			
		Q	1	3745-58-51	265.401			
			2	"	"			
19			3	3745-58-52	265.402			
			4	3745-58-53	265.403			
			5	3745-58-55	265-405			
			6	3745-58-56	265.406			
	IX I	(A)		3745-52-40	262.40			
		(B)	1	3745-52-21	262.21			
			2	"	"			
20			3	"	"			
			4	"	"			
			5	"	"			
			6	"	"			
			8	" 50-42	" 122.6			
		(C)		3745-52-42	262.42		✓	
	2	(A)		3745-52-30	262.30		✓	
		(B)		3745-52-31	262.31			
		(C)		3745-52-33	262.33			
21	3		1	3745-52-34	262.34			
			2	"	"			
			3	3745-56-54	265.174			
			4a	3745-56-72	265.192			
			b	"	"			
			c	"	"			
			d	3745-56-74	265.184			
			e	3745-56-78	265.19B			
			f	3745-56-79	265.199			
22	VI	A		3745-52-40	262.40			
		B		3745-52-41	262.41			
	VII		1a	3745-52-50	262.50			
			b	"	"			
			c	"	"			
			2	"	"			
23	X I			3745-53-22	263.22			
	II	A		3745-53-20	263.20			
		B		"	"			
	V	A		3745-53-10	263.10			
		B		3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 05-31-0441

U.S. EPA I.D. # OH 004 260 089

PART 1. GENERAL INFORMATION

Facility: GMAD Norwood Address: 1726 Smith Road City: Norwood

State: Ohio Zip Code: 45212 County: Hamilton Telephone: 513/841-5102

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	Mark Endres	Environmental Engineer	
2.	Gerry Killeen	Administrator	
3.	John Disney	Powerhouse Chief Engineer	

INSPECTOR(S)

1.	JEFFREY MOLER	ENVIRONMENTAL ENGINEER	513/461-4670
2.	THOMAS ONTKO	SOLID WASTE SCIENTIST	" " "
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- ☒ Containers S01
- ☒ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment
- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80
- ☐ Chemical/Physical/ Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

Revised 9/15/82

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	✓			
2. If "yes", is it complete and accurate?	✓			
3. Has the facility submitted a Part B?		✓		

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	✓			
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	✓			
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	✓			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)			✓	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	✓			

	Yes	No	N/A	Remark
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	✓			
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".			✓	
b) The date that accumulation began is clearly marked on each container.			✓	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).		X		
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	X			

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

43 HW
PUCO #

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	Yes	No	N/A	Remark #
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste.	✓			
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Section 262.	✓			
3. The transporter has signed the manifest as required by Section 263.20(b) and has carried the manifest with the waste shipment as required by 263.20(c).	✓			
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)).	✓			
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21).	✓			
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f).			✓	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c).			✓	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	X			8
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)).	X			

	Yes	No	N/A	Remark #
b) Were all of the notifications required by Section 263.30(c)(d) made?	X			
c) Was the discharge cleaned up as required by Section 263.31?	X			
9. Does the transporter store hazardous waste temporarily while they are in transit?			X	
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage (263.12).			X	

NOTE : TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?			X	
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?			X	

NOTE : A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	✓			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).		✓		
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).		✓		
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).		✓		
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or	✓			
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2).	✓			

	Yes	No	N/A	Remark #
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	✓			
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)		✓		4
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)		✓		5
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.		✓		6
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	✓			
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.	✓			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	✓			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)			✓	

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	___	___	___	_____
b) Arrangements or agreements with local or state emergency authorities.	___	___	___	_____
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	___	___	___	_____
d) A list of all emergency equipment including location, physical description and outline of capabilities.	___	___	___	_____
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))	___	___	___	_____
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)	___	___	___	_____
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)	___	___	___	_____
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)	___	___	___	_____
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.	___	___	___	_____

RCRA INTERIM STATUS INSPECTION FORM

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:				
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			
e) The present physical location of each hazardous waste within the facility.	✓			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)			✓	
g) Records of any waste analyses and trial tests required to be performed.				
h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).				
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).				
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.				

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	✓			

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)			✓	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)			✓	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))			✓	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.			✓	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.			✓	

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	✓			
a) A description of how and when the facility will be closed. (265.112(a)(1).	✓			

	Yes	No	N/A	Remark #
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.(NOTE: Maximum inventory should agree with the permit.)	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a schedule for the various phases of closure.		✓		
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			✓	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			✓	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or				7
b) A surety bond, or				
c) A closure letter of credit, or				
d) A combination of financial mechanisms.				

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

	Yes	No	N/A	Remark #
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.	✓			

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)		✓		1
b) In good physical condition (265.171)	✓			
c) Compatible with the wastes stored in them (265.172)	✓			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))		✓		1
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓			
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c)	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).	✓			
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).			✓	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).		✓		2
4. Weekly inspections are made of all tank construction materials and containment structures (265.194).		✓		3
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			✓	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			✓	
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).			✓	

	Yes	No	N/A	Remark #
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	✓			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)	✓			
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (265.199)	✓			
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).				

Comments - GMAD - Norwood

1) One 55 gallon drum, lid does not close and ring does not secure the container.

2) weekly

3) Biweekly

4) Inspection log does not exist as an entity.

5) Minor spill is being cleaned up. Absorbant is still on ground. Area is not inspected daily.

6) No indication of when training is received or renewed.

7) Nothing on file at the plant. Corporate headquarters has the material.